

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EASTRIVER PARTNERS, INC., Individually	:	Civil Action No. 1:07-cv-10617-LTS
and On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
FOCUS MEDIA HOLDING LIMITED, et al.,	:	
	:	
Defendants.	:	
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SCOTT BAUER, Individually and On Behalf	:	Civil Action No. 1:07-cv-11479-LTS
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
FOCUS MEDIA HOLDING LIMITED, et al.,	:	
	:	
Defendants.	:	
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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investor Iron Workers Local No. 25 Pension Fund (“Iron Workers Local No. 25”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Iron Workers Local No. 25 as Lead Plaintiff; (iii) approving Iron Workers Local No. 25’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Iron Workers Local No. 25 submits herewith a Memorandum of Law and Declaration of Mario Alba Jr., dated January 28, 2008.

DATED: January 28, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

/s/ Mario Alba Jr.
MARIO ALBA JR.

SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.
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Melville, NY 11747
Telephone: 631/367-7100
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[Proposed] Lead Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on January 28, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of The Iron Workers Local No. 25 Pension Fund For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel; and

Declaration Of Mario Alba Jr. In Support Of The Motion Of The Iron Workers Local No. 25 Pension Fund For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

FOCUS MEDIA

Service List - 1/28/2008 (07-0271)

Page 1 of 1

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	:	
FOCUS MEDIA HOLDING LIMITED, et al.,	:	
	:	
Defendants.	:	
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[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the Motion of Iron Workers Local No. 25 Pension Fund (“Iron Workers Local No. 25”) for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefore:

1. The Actions are hereby consolidated;
2. Iron Workers Local No. 25 is hereby appointed Lead Plaintiff for the Class pursuant to Section 27 of the Securities Act of 1933 and Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LAURA T. SWAIN
UNITED STATES DISTRICT JUDGE

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